

Additional Comments in the matter of FCC Docket 02-98

Subset; RM-10209, Amendment of Parts 2 and 97 of the Commission's Rules regarding the allocation of a Band near 5MHz for the Amateur Radio Service

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On this, the final day for the formal filing of Comments in the proceeding before the Federal Communications Commission, we learn that the government of Great Britain will be among the first to join the United States in allowing amateur radio operator activity on a small portion of the "60 meter band" shortwave.

From RSGB News, Sunday, July 28, 2002

The 'Fivemegs Experiment' Starts This Week

The Radio Society of Great Britain is pleased to announce that permission has been granted by the Ministry of Defence and the Radiocommunications Agency for the allocation of five spot frequencies in the range of 5250 to 5450kHz. The purpose of the experiment is to carry out propagation and antenna investigations aimed at improving the understanding of Near Zenithal Radiation or NVIS - Near Vertical-Incidence Skywave - communications via the ionosphere.

The frequencies assigned are 5260, 5280, 5290, 5400 and 5405kHz. These will be made available in the form of 3-kHz bandwidth channels by way of a Notice of Variation to the amateur radio licence.

In the first instance, NOV's will only be issued to Full Class A licence holders. It is hoped to relax this ruling as the experiment progresses. As this is a controlled experiment, applicants will be required to report their findings and results to the RSGB. The RSGB is tasked with providing both the Radiocommunications Agency and the Ministry of Defence with reports on findings as the experiment progresses.

Full licence holders interested in taking part in the 'Fivemegs Experiment' can obtain an application form and further details from the [RSGB website](#).

The first NOV's are expected to be issued by the Radiocommunications Agency on or around the 1st of August. It is anticipated that the experiment will run for a period not exceeding four years

The additional comments filed here today speak to the key points of this announcement as applied to Docket 02-98.

(more)

Great Britain's radio authority has taken a cautious approach in establishing the protocol for this experiment with unusual channelized operating, restricted bandwidth, and by allowing only upper-class licensees.

However, the parameters are considered an initial layout for the experiment, and are likely to be "relaxed" as activities move ahead. Additionally, there is no restriction by mode in experiments throughout this segment.

Ideally, amateurs in the United Kingdom will eventually be granted permanent authorization. The terms of such a grant are likely to follow those established by the United States, which in turn have been based on the results of an experimental authorization the FCC had granted U.S. amateurs.

The U.S. experiment has yielded the generous proposal from the FCC now contained in **Docket 02-98** which concludes such an authorization is justified and beneficial with full power on an undivided, non-channelized segment, and with participation by all licensees General-class and above.

The FCC should feel proud of its leadership role and affirmed by the U.K.'s decision to allow its amateurs to join their U.S. counterparts. This leadership can best continue by leaving intact the Docket's proposed *least restrictive protocol* for U.S. amateurs.

Under this protocol, we have the potential to demonstrate maximum flexibility in precluding interference to primary users, while implementing the greatest utilization of the available allocation among the various modes and activities.

We additionally would have the best capability of communicating with our U.K. friends as they experiment with multiple modes and activities throughout what will become the U.S. allocation of 5250-5400Kc.

It would be counterproductive to establish federally mandated reservations for any specialty modes or activities in the proposed 60 meter band, because such mandates could preclude compatible mode communications with hams in the U.K. and additional countries that subsequently endorse this allocation.

Thank you for allowing this opportunity for additional comment.